

1 Paul J. Virgo, No. 67900
2 Post Office Box 67682
3 Los Angeles, California 90067-0682
4 Telephone: (310) 666-9701
5 Fax: (310) 785-9081
6
7
8

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STATE BAR COURT
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LOS ANGELES

9 **THE STATE BAR COURT**
10 **HEARING DEPARTMENT - LOS ANGELES**

11 In the Matter of) Case Nos.: 09-O-13589,
12) 09-O-17413, 09-O-18914,
13 ZACHARY I. GONZALEZ, Respondent) 09-O-19279, 09-O-19316,
14) 10-O-01289, 10-O-03162,
15 No. 259663) 10-O-03507, 10-O-03674,
16) 10-O-03809
17)
18 A Member of the State Bar)
19)
20) RESPONDENT'S ANSWER TO NOTICE
21 OF DISCIPLINARY CHARGES
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29 TO THE HONORABLE RICHARD A. PLATEL, JUDGE OF THE STATE BAR
30 COURT OF THE STATE BAR OF CALIFORNIA, AND TO THE OFFICE OF THE
31 CHIEF TRIAL COUNSEL OF THE STATE BAR OF CALIFORNIA:

32 Pursuant to Rule 103 of the Rules of Procedure of the
33 State Bar of California, Respondent Zachary I. Gonzalez, by and
34 through his attorney of record, hereby submits the following in
35 response to the Notice of Disciplinary Charges (hereinafter
36 "NDC") on file herein:

37 Under the provisions of the Rules of Procedure of the
38 State Bar of California, Respondent Zachary I. Gonzalez hereby
39 generally denies each and every allegation of the NDC and the

1 whole thereof, and further denies the Respondent has violated
2 any Rule of Professional Conduct in any manner whatsoever. In
3 response to the specific allegations set forth in the NDC on
4 file herein, Respondent Zachary I. Gonzalez:

5 JURISDICTION

6 1. In response to Paragraph 1 of the NDC, Respondent
7 admits said allegations for jurisdictional purposes only.
8

9 BACKGROUND ALLEGATIONS

10 2. In response to Paragraph 2 of the NDC, Respondent
11 denies said allegations.
12

13 Case No. 09-O-13589

14 COUNT 1

15 3. In response to paragraph 3 of the NDC, Respondent
16 denies said allegations

17 4. In response to Paragraph 4 of the NDC, Respondent
18 denies said allegations on information and belief.

19 5. In response to Paragraph 5 of the NDC, Respondent
20 denies said allegations.

21 6. In response to Paragraph 6 of the NDC, Respondent
22 denies said allegations.

23 Count 2

24 7. In response to Paragraph 7 of the NDC, Respondent
25 denies said allegations.

26 8. In response to Paragraph 8 of the NDC, the responses in
27 Count One are incorporated by reference.

28 9. In response to Paragraph 9 of the NDC, Respondent can
neither admit or deny said allegation.

2 denies said allegations.

3 11. In response to Paragraph 11 of the NDC, Respondent
4 denies said allegations.

5
6 Case No. 09-O-13845

7 Count 3

8 12. In response to Paragraph 12 of the NDC, Respondent
9 denies said allegations.

10 13. In response to Paragraph 13 of the NDC, Respondent
11 denies said allegations on information and belief.

12 14. In response to Paragraph 14 of the NDC, denies said
13 allegations.

14 15. In response to Paragraph 15 of the NDC, denies said
15 allegations.

16 Count 4.

17 16. In response to Paragraph 16 of the NDC, Respondent
18 denies said allegations.

19 17. In response to Paragraph 17 of the NDC, the responses
20 in Count 3 are incorporated by reference.

21 18. In response to Paragraph 18 of the NDC, Respondent can
22 neither admit or deny said allegations.

23 19. In response to Paragraph 19 of the NDC, Respondent
24 denies said allegations.

25 20. In response to Paragraph 20 of the NDC, Respondent
26 denies said allegations.

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10. In response to Paragraph 10 of the NDC, Respondent

1 Case No. 09-O-17413

2 Count 5

3 21. In response to Paragraph 21 of the NDC, Respondent
4 denies said allegations.

5 22. In response to Paragraph 22 of the NDC, Respondent
6 denies said allegations on information and belief.

7 23. In response to Paragraph 23 of the NDC, Respondent
8 denies said allegations.

9 24. In response to Paragraph 24 of the NDC, Respondent
10 denies said allegations on information and belief.

11 25. In response to Paragraph 25 of the NDC, Respondent
12 denies said allegations.

13 26. In response to Paragraph 26 of the NDC, Respondent
14 denies said allegations.

15 Count 6

16 27. In response to Paragraph 27 of the NDC, Respondent
17 denies said allegations.

18 28. In response to Paragraph 28 of the NDC, the responses
19 in Count 5 are incorporated by reference.

20 29. In response to Paragraph 29 of the NDC, Respondent
21 denies said allegations.

22 Count 7

23 30. In response to Paragraph 30 of the NDC, Respondent
24 denies said allegations.

25 31. In response to Paragraph 31 of the NDC, the responses
26 in Count 5 are incorporated by reference.

27 32. In response to Paragraph 32 of the NDC, Respondent
28 denies said allegations on information and belief.

1 33. In response to Paragraph 33 of the NDC, Respondent
2 denies said allegations on information and belief.

3 34. In response to Paragraph 34 of the NDC, Respondent
4 denies said allegations.

5 Count 8

6 35. In response to Paragraph 35 of the NDC, Respondent
7 denies said allegations.

8 36. In response to Paragraph 36 of the NDC, the responses
9 in Counts 5 and 7 are incorporated by reference.

10 37. In response to Paragraph 37 of the NDC, Respondent
11 denies said allegations on information and belief.

12 38. In response to Paragraph 38 of the NDC, Respondent
13 denies said allegations.

14 COUNT 9

15 39. In response to Paragraph 39 of the NDC, Respondent
16 denies said allegations.

17 40. In response to Paragraph 40 of the NDC, the responses
18 in Count 5 are incorporated by reference.

19 41. In response to Paragraph 41 of the NDC, Respondent
20 denies said allegations.

21 42. In response to Paragraph 42 of the NDC, Respondent
22 denies said allegations.

23 43. In response to Paragraph 43 of the NDC, Respondent
24 denies said allegations.

25 Count 10

26 44. In response to Paragraph 44 of the NDC, Count 8 is
27 incorporated by reference.

28 45. In response to Paragraph 45 of the NDC, the responses
in Count 5 are incorporated by reference.

1 46. In response to Paragraph 46 of the NDC, Respondent
2 denies said allegations on information and belief.

3 47. In response to Paragraph 47 of the NDC, Respondent
4 denies aid allegations.

5 48. In response to Paragraph 48 of the NDC, Respondent
6 denies said allegations.

7 Count 11

8 49. In response to Paragraph 49 of the NDC, Respondent
9 denies said allegations.

10 50. In response to Paragraph 50 of the NDC, the responses
11 in Count 5 are incorporated by reference.

12 51. In response to paragraph 51 of the NDC, Respondent
13 denies said allegations.

14
15 Case No. 09-O-18914

16 Count 12

17 52. In response to paragraph 52 of the NDC, Respondent
18 denies said allegations.

19 53. In response to paragraph 53 of the NDC, Respondent can
20 neither admit or deny said allegations.

21 54. In response to paragraph 54 of the NDC, Respondent
22 denies said allegations.

23 55. In response to paragraph 55 of the NDC, Respondent
24 denies said allegations on information and belief.

25 56. In response to paragraph 56 of the NDC, Respondent can
26 neither admit or deny said allegations.

27 57. In response to paragraph 57 of the NDC, Respondent
28 denies said allegations.

1 58. In response to paragraph 58 of the NDC, Respondent
2 denies said allegations.

3 Count 13

4 59. In response to paragraph 59 of the NDC, Respondent
5 denies said allegations.

6 60. In response to paragraph 60 of the NDC, the responses
7 in Count 12 are incorporated by reference.

8 61. In response to paragraph 61 of the NDC, Respondent
9 denies said allegations.

10 COUNT 14

11 62. In response to paragraph 62 of the NDC, Respondent
12 denies said allegations.

13 63. In response to paragraph 63 of the NDC, the responses
14 in Count 12 are incorporated by reference.

15 64. In response to paragraph 64 of the NDC, Respondent
16 denies said allegations on information and belief.

17 65. In response to paragraph 65 of the NDC, Respondent
18 denies said allegations.

19 COUNT 15

20 66. In response to paragraph 66 of the NDC, Respondent
21 denies said allegations.

22 67. In response to paragraph 67 of the NDC, the responses
23 in Counts 12 and 14 are incorporated by reference.

24 68. In response to paragraph 68 of the NDC, Respondent
25 denies said allegations on information and belief.

26 69. In response to paragraph 69 of the NDC, Respondent
27 denies said allegations on information and belief.

28 70. In response to paragraph 70 of the NDC, Respondent
denies said allegations.

2 71. In response to paragraph 71 of the NDC, Respondent
3 denies said allegations.

4 72. In response to paragraph 72 of the NDC, the responses
5 in Counts 12 and 14 are incorporated by reference.

6 73. In response to paragraph 73 of the NDC, Respondent
7 denies said allegations.

8 74. In response to paragraph 74 of the NDC, Respondent
9 denies said allegations on information and belief.

10 Count 17

11 75. In response to paragraph 75 of the NDC, Respondent
12 denies said allegations.

13 76. In response to paragraph 76 of the NDC, the responses
14 in Count 12 are incorporated by reference.

15 77. In response to paragraph 77 of the NDC, Respondent
16 denies said allegations.

17 78. In response to paragraph 78 of the NDC, Respondent
18 denies said allegations.

19 Count 18

20 79. In response to paragraph 79 of the NDC, Respondent
21 denies said allegations.

22 80. In response to paragraph 80 of the NDC, the responses
23 in Count 12 are incorporated by reference.

24 81. In response to paragraph 81 of the NDC, Respondent
25 denies said allegations.

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28 ///

1 Case No. 09-O-19279

2 Count 19

3 82. In response to paragraph 82 of the NDC, Respondent
4 denies said allegations.

5 83. In response to paragraph 83 of the NDC, Respondent
6 denies said allegations on information and belief.

7 84. In response to paragraph 84 of the NDC, Respondent
8 denies said allegations on information and belief.

9 85. In response to paragraph 85 of the NDC, Respondent
10 denies said allegations on information and belief.

11 86. In response to paragraph 86 of the NDC, Respondent
12 denies said allegations on information and belief.

13 87. In response to paragraph 87 of the NDC, Respondent
14 denies said allegations on information and belief.

15 88. In response to paragraph 88 of the NDC, Respondent
16 denies said allegations.

17 89. In response to paragraph 89 of the NDC, Respondent
18 denies said allegations on information and belief.

19 90. In response to paragraph 90 of the NDC, Respondent
20 denies said allegations.

21 Count 20

22 91. In response to paragraph 91 of the NDC, Respondent
23 denies said allegations.

24 92. In response to paragraph 92 of the NDC, the responses
25 in Count 19 are incorporated by reference.

26 93. In response to paragraph 93 of the NDC, Respondent
27 denies said allegations.

28 ///

1 **Count 21**

2 94. In response to paragraph 94 of the NDC, Respondent
3 denies said allegations.

4 95. In response to paragraph 95 of the NDC, the responses
5 in Count 19 are incorporated by reference.

6 96. In response to paragraph 96 of the NDC, Respondent
7 denies said allegations.

8 **Count 22**

9 97. In response to paragraph 97 of the NDC, Respondent
10 denies said allegations.

11 98. In response to paragraph 98 of the NDC, the responses
12 in Count 19 are incorporated by reference.

13 99. In response to paragraph 99 of the NDC, Respondent
14 denies said allegations.

15 **Count 23**

16 100. In response to paragraph 100 of the NDC, Respondent
17 denies said allegations.

18 101. In response to paragraph 101 of the NDC, the responses
19 in Count 19 are incorporated by reference.

20 102. In response to paragraph 102 of the NDC, Respondent
21 denies said allegations.

22 **Count 24**

23 103. In response to paragraph 103 of the NDC, Respondent
24 denies said allegations.

25 104. In response to paragraph 104 of the NDC, the responses
26 in Count 19 are incorporated by reference.

27 105. In response to paragraph 105 of the NDC, Respondent
28 denies said allegations.

1 106. In response to paragraph 106 of the NDC, Respondent
2 denies said allegations.

3 Count 25

4 107. In response to paragraph 107 of the NDC, Respondent
5 denies said allegations.

6 108. In response to paragraph 108 of the NDC, the responses
7 in Count 19 are incorporated by reference.

8 109. In response to paragraph 109 of the NDC, Respondent
9 denies said allegations on information and belief.

10 110. In response to paragraph 110 of the NDC, Respondent
11 denies said allegations.

12 111. In response to paragraph 111 of the NDC, Respondent
13 denies said allegations.

14
15 Case No. 09-O-19316

16 Count 26

17 112. In response to paragraph 112 of the NDC, Respondent
18 denies said allegations

19 113. In response to paragraph 113 of the NDC, Respondent
20 denies said allegations on information and belief.

21 114. In response to paragraph 114 of the NDC, Respondent
22 denies said allegations.

23 Count 27

24 115. In response to paragraph 115 of the NDC, Respondent
25 denies said allegations.

26 116. In response to paragraph 116 of the NDC the responses
27 in Count 26 are incorporated by reference.

28 117. In response to paragraph 117 of the NDC, Respondent
denies said allegations on information and belief.

1 118. In response to paragraph 118 of the NDC, Respondent
2 denies said allegations.

3 Count 28

4 119. In response to paragraph 119 of the NDC, Respondent
5 denies said allegations.

6 120. In response to paragraph 120 of the NDC, the responses
7 in Count 26 are incorporated by reference.

8 121. In response to paragraph 121 of the NDC, Respondent
9 denies said allegations on information and belief.

10 122. In response to paragraph 122 of the NDC, Respondent can
11 neither admit or deny said allegations.

12 123. In response to paragraph 123 of the NDC, Respondent
13 denies said allegations on information and belief.

14 124. In response to paragraph 124 of the NDC, Respondent
15 denies said allegations on information and belief.

16 125. In response to paragraph 125 of the NDC, Respondent
17 denies said allegations on information and belief.

18 126. In response to paragraph 126 of the NDC, Respondent
19 denies said allegations on information and belief.

20 127. In response to paragraph 127 of the NDC, Respondent
21 denies said allegations on information and belief.

22 128. In response to paragraph 128 of the NDC, Respondent
23 denies said allegations.

24 Count 29

25 129. In response to paragraph 129 of the NDC, Respondent
26 denies said allegations.

27 130. In response to paragraph 130 of the NDC, the responses
28 in Count 26 are incorporated by reference.

3 Count 30

4 132. In response to paragraph 132 of the NDC
5 Respondent denies said allegations.

6 133. In response to paragraph 133 of the NDC, the responses
7 in Count 26 are incorporated by reference.

8 134. In response to paragraph 134 of the NDC, Respondent
9 denies said allegations.

10 Count 31

11 135. In response to paragraph 135 of the NDC, Respondent
12 denies said allegations.

13 136. In response to paragraph 136 of the NDC, the responses
14 in Count 26 are incorporated by reference.

15 137. In response to paragraph 137 of the NDC, Respondent
16 denies said allegations on information and belief.

17 138. In response to paragraph 138 of the NDC, Respondent
18 denies said allegations.

19 139. In response to paragraph 139 of the NDC, Respondent
20 denies said allegations.

21
22 Case No. 10-O-01289

23 Count 32

24 140. In response to paragraph 140 of the NDC, Respondent
25 denies said allegations.

26 141. In response to paragraph 141 of the NDC, Respondent
27 denies said allegations.

28 142. In response to paragraph 142 of the NDC, Respondent
denies said allegations.

1 131. In response to paragraph 131 of the NDC

2 Respondent denies said allegations.

1 Count 33

2 143. In response to paragraph 143 of the NDC, Respondent
3 denies said allegations.

4 144. In response to paragraph 144 of the NDC, the responses
5 in Count 32 are incorporated by reference.

6 145. In response to paragraph 145 of the NDC, Respondent can
7 neither admit or deny said allegations.

8 146. In response to paragraph 146 of the NDC, Respondent
9 denies said allegations.

10 147. In response to paragraph 147 of the NDC, Respondent
11 denies said allegations.

12 148. In response to paragraph 148 of the NDC, Respondent can
13 neither admit or deny said allegations.

14 149. In response to paragraph 149 of the NDC, Respondent
15 denies said allegations.

16 150. In response to paragraph 150 of the NDC, Respondent
17 denies said allegations.

18 151. In response to paragraph 151 of the NDC, Respondent can
19 neither admit or deny said allegations.

20 152. In response to paragraph 152 of the NDC, Respondent
21 denies said allegations.

22 Count 34

23 153. In response to paragraph 153 of the NDC, Respondent
24 denies said allegations.

25 154. In response to paragraph 154 of the NDC, the responses
26 to Counts 32 and 33 are incorporated by reference.

27 155. In response to paragraph 155, Respondent can neither
28 admit or deny said allegations.

1 156. In response to paragraph 156, Respondent denies said
2 allegations.

3 157. In response to paragraph 157, Respondent can neither
4 admit or deny said allegations.

5 158. In response to paragraph 158 of the NDC, Respondent
6 denies said allegations on information and belief.

7 159. In response to paragraph 159, Respondent denies said
8 allegations on information and belief.

9 160. In response to paragraph 160, Respondent denies said
10 allegations on information and belief.

11 161. In response to paragraph 161 of the NDC, Respondent
12 denies said allegations.

13 162. In response to paragraph 162 of the NDC, Respondent
14 denies said allegations.

15 Count 35

16 163. In response to paragraph 163 of the NDC, Respondent
17 denies said allegations.

18 164. In response to paragraph 164 of the NDC, the responses
19 to Counts 32, 33, and 34 are incorporated by reference.

20 165. In response to paragraph 165 of the NDC, Respondent
21 denies said allegations.

22 Count 36

23 166. In response to paragraph 166 of the NDC, Respondent
24 denies said allegations.

25 167. In response to paragraph 167 of the NDC, the responses
26 to Counts 32, 33, and 34 are incorporated by reference.

27 168. In response to paragraph 168 of the NDC, Respondent
28 denies said allegations.

1 169. In response to paragraph 169 of the NDC, Respondent
2 denies said allegations.

3 Count 37

4 170. In response to paragraph 170 of the NDC, Respondent
5 denies said allegations.

6 171. In response to paragraph 171 of the NDC the responses
7 to Counts 32 and 33 are incorporated by reference.

8 172. In response to paragraph 172 of the NDC, the Agreement
9 speaks for itself.

10 173. In response to paragraph 173 of the NDC, Respondent
11 denies said allegations.

12
13 Case No. 10-O-03162

14 Count 38

15 174. In response to paragraph 174 of the NDC, Respondent
16 denies said allegations.

17 175. In response to paragraph 175 of the NDC, Respondent
18 denies said allegations on information and belief.

19 176. In response to paragraph 176 of the NDC, Respondent
20 denies said allegations.

21 177. In response to paragraph 177 of the NDC, Respondent can
22 neither admit or deny said allegations.

23 178. In response to paragraph 178 of the NDC, Respondent can
24 neither admit or deny said allegations.

25 179. In response to paragraph 179 of the NDC, Respondent can
26 neither admit or deny said allegations.

27 180. In response to paragraph 180 of the NDC, Respondent can
28 neither admit or deny said allegations.

1 181. In response to paragraph 181 of the NDC, Respondent can
2 neither admit or deny said allegations.

3 182. In response to paragraph 182 of the NDC, Respondent can
4 neither admit or deny said allegations.

5 183. In response to paragraph 183 of the NDC, Respondent can
6 neither admit or deny said allegations.

7 184. In response to paragraph 184 of the NDC, can neither
8 admit or deny said allegations.

9 185. In response to paragraph 185 of the NDC, can neither
10 admit or deny said allegations.

11 186. In response to paragraph 186 of the NDC, Respondent
12 denies said allegations on information and belief.

13 187. In response to paragraph 187 of the NDC, Respondent
14 denies said allegations.

15 Count 39

16 188. In response to paragraph 188 of the NDC, Respondent
17 denies said allegations.

18 189. In response to paragraph 189 of the NDC, the responses
19 to Count 38 are incorporated by reference.

20 190. In response to paragraph 190 of the NDC, Respondent
21 denies said allegations.

22 Count 40

23 191. In response to paragraph 191 of the NDC, Respondent
24 denies said allegations.

25 192. In response to paragraph 192 of the NDC, the responses
26 to Count 38 are incorporated by reference.

27 193. In response to paragraph 193 of the NDC, Respondent
28 denies said allegations.

1 Count 41

2 194. In response to paragraph 194 of the NDC, Respondent
3 denies said allegations.

4 195. In response to paragraph 195 of the NDC, the responses
5 in Count 38 are incorporated by reference.

6 196. In response to paragraph 196 of the NDC, Respondent
7 denies said allegations on information and belief.

8 197. In response to paragraph 197 of the NDC, Respondent
9 denies said allegations on information and belief.

10 198. In response to paragraph 198 of the NDC, Respondent
11 denies said allegations on information and belief.

12 199. In response to paragraph 199 of the NDC, Respondent
13 denies said allegations.

14 200. In response to paragraph 200 of the NDC, Respondent can
15 neither admit or deny said allegations.

16 201. In response to paragraph 201 of the NDC, Respondent can
17 neither admit or deny said allegations.

18 202. In response to paragraph 202 of the NDC, Respondent
19 denies said allegations.

20 203. In response to paragraph 203 of the NDC, Respondent
21 denies said allegations.

22 Count 42

23 204. In response to paragraph 204 of the NDC, Respondent
24 denies said allegations.

25 205. In response to paragraph 205 of the NDC, the responses
26 in Count 38 are incorporated by reference.

27 206. In response to paragraph 206 of the NDC, Respondent
28 denies said allegations on information and belief.

1 207. In response to paragraph 207 of the NDC, Respondent
2 denies said allegations.

3 Count 43

4 208. In response to paragraph 208 of the NDC, Respondent
5 denies said allegations.

6 209. In response to paragraph 209 of the NDC, the responses
7 in Count 38 are incorporated by reference.

8 210. In response to paragraph 210 of the NDC, Respondent
9 denies said allegations.

10 211. In response to paragraph 211 of the NDC, Respondent
11 denies said allegations.

12 Count 44

13 212. In response to paragraph 212 of the NDC, Respondent
14 denies said allegations.

15 213. In response to paragraph 213 of the NDC, the responses
16 in Count 38 are incorporated by reference.

17 214. In response to paragraph 214 of the NDC, Respondent
18 denies said allegations.

19 Count 45

20 215. In response to paragraph 215 of the NDC, Respondent
21 denies said allegations.

22 216. In response to paragraph 216 of the NDC, the responses
23 in Count 38 are incorporated by reference.

24 217. In response to paragraph 217 of the NDC, the Agreement
25 speaks for itself.

26 218. In response to paragraph 218 of the NDC, Respondent
27 denies said allegations.

28 ///

1 Case No. 10-O-03507

2 Count 46

3 219. In response to paragraph 219 of the NDC, Respondent
4 denies said allegations.

5 220. In response to paragraph 220 of the NDC, Respondent can
6 neither admit or deny said allegations.

7 221. In response to paragraph 221 of the NDC, Respondent can
8 neither admit or deny said allegations.

9 222. In response to paragraph 222 of the NDC, Respondent
10 denies said allegations.

11 223. In response to paragraph 223 of the NDC, Respondent can
12 neither admit or deny said allegations.

13 224. In response to paragraph 224 of the NDC, Respondent can
14 neither admit or deny said allegations.

15 225. In response to paragraph 225 of the NDC, Respondent can
16 neither admit or deny said allegations.

17 226. In response to paragraph 226 of the NDC, Respondent
18 denies said allegations on information and belief.

19 227. In response to paragraph 227 of the NDC, Respondent
20 denies said allegations on information and belief.

21 228. In response to paragraph 228 of the NDC, Respondent
22 denies said allegations.

23 Count 47

24 229. In response to paragraph 229 of the NDC, Respondent
25 denies said allegations.

26 230. In response to paragraph 230 of the NDC, the responses
27 to Count 46 are incorporated by reference.

28 231. In response to paragraph 231 of the NDC, Respondent
denies said allegations.

1 Count 48

2 232. in response to paragraph 232 of the NDC, Respondent
3 denies said allegations.

4 233. In response to paragraph 233 of the NDC, the responses
5 to Count 46 are incorporated by reference.

6 234. In response to paragraph 234 of the NDC, Respondent
7 denies said allegations.

8 Count 49

9 235. In response to paragraph 235 of the NDC, Respondent
10 denies said allegations.

11 236. In response to paragraph 236 of the NDC, the responses
12 in Count 46 are incorporated by reference.

13 237. In response to paragraph 237 of the NDC, Respondent
14 denies said allegations.

15 Count 50

16 238. In response to paragraph 238 of the NDC, Respondent
17 denies said allegations.

18 239. In response to paragraph 239 of the NDC, the responses
19 in Count 46 are incorporated by reference.

20 240. In response to paragraph 240 of the NDC, Respondent
21 denies said allegations.

22 241. In response to paragraph 241 of the NDC, Respondent
23 denies said allegations.

24 Count 51

25 242. In response to paragraph 242 of the NDC, Respondent
26 denies said allegations.

27 243. In response to paragraph 243 of the NDC, the responses
28 in Count 46 are incorporated by reference.

1 244. In response to paragraph 244 of the NDC, Respondent
2 denies said allegations.

3 Count 52

4 245. In response to paragraph 245 of the NDC, Respondent
5 denies said allegations.

6 246. In response to paragraph 246 of the NDC, the responses
7 in Count 46 are incorporated by reference.

8 247. In response to paragraph 247 of the NDC, Respondent
9 denies said allegations.

10 Count 53

11 248. In response to paragraph 248 of the NDC, Respondent
12 denies said allegations.

13 249. In response to paragraph 249 of the NDC, the responses
14 in Count 46 are incorporated by reference.

15 250. In response to paragraph 250 of the NDC, the Agreement
16 speaks for itself.

17 251. In response to paragraph 251 of the NDC, Respondent
18 denies said allegations.

19
20 Case No. 10-O-03674

21 Count 54

22 252. In response to Count 252 of the NDC, Respondent denies
23 said allegations.

24 253. In response to paragraph 253 of the NDC, Respondent
25 denies said allegations on information and belief.

26 254. In response to paragraph 254, the Agreement speaks for
27 itself.

28 255. In response to paragraph 255, Respondent can neither
admit or deny said allegations.

1 256. In response to paragraph 256 of the NDC, Respondent
2 denies said allegations on information and belief.

3 257. In response to paragraph 257 of the NDC, Respondent can
4 neither admit or deny said allegations.

5 258. In response to paragraph 258 of the NDC, Respondent
6 denies said allegations.

7 259. In response to paragraph 259 of the NDC, Respondent
8 denies said allegations.

9 Count 55

10 260. In response to paragraph 260 of the NDC, Respondent
11 denies said allegations.

12 261. In response to paragraph 261 of the NDC, the responses
13 in Count 54 are incorporated by reference.

14 262. In response to paragraph 262 of the NDC, Respondent
15 denies said allegations.

16 Count 56

17 263. In response to paragraph 263 of the NDC, Respondent
18 denies said allegations.

19 264. In response to paragraph 264 of the NDC, the responses
20 in Count 54 are incorporated by reference.

21 265. In response to paragraph 265 of the NDC, Respondent
22 denies said allegations.

23 Count 57

24 266. In response to paragraph 266 of the NDC, Respondent
25 denies said allegations.

26 267. In response to paragraph 267 of the NDC, the responses
27 in Count 54 of the NDC are incorporated by reference.

28 268. In response to paragraph 268 of the NDC, Respondent
denies said allegations.

1 Count 58

2 269. In response to paragraph 269 of the NDC, Respondent
3 denies said allegations.

4 270. In response to paragraph 270 of the NDC, the responses
5 in Count 54 are incorporated by reference.

6 271. In response to paragraph 271 of the NDC, Respondent
7 denies said allegations.

8 Count 59

9 272. In response to paragraph 272 of the NDC, Respondent
10 denies said allegations.

11 273. In response to paragraph 273 of the NDC, the responses
12 in Count 54 are incorporated by reference.

13 274. In response to paragraph 274 of the NDC, Respondent
14 denies said allegations.

15 Count 60

16 275. In response to paragraph 275 of the NDC, Respondent
17 denies said allegations.

18 276. In response to paragraph 276 of the NDC, the responses
19 in Count 54 are incorporated by reference.

20
21 Case No. 10-O-03809

22 Count 61

23 279. In response to paragraph 279 of the NDC, Respondent
24 denies said allegations.

25 280. In response to paragraph 280 of the NDC, Respondent can
26 neither admit or deny said allegations.

27 281. In response to paragraph 281 of the NDC, Respondent
28 denies said allegations.

1 282. In response to paragraph 282 of the NDC, Respondent can
2 neither admit or deny said allegations.

3 283. In response to paragraph 283 of the NDC, Respondent
4 denies said allegations on information and belief.

5 284. In response to paragraph 284 of the NDC, Respondent
6 denies said allegations.

7 285. In response to paragraph 285 of the NDC, Respondent
8 denies said allegations.

9 286. In response to paragraph 286 of the NDC, Respondent
10 denies said allegation on information and belief.

11 287. In response to paragraph 287 of the NDC, Respondent
12 denies said allegations.

13 Count 62

14 288. In response to paragraph 288 of the NDC, Respondent
15 denies said allegations.

16 289. In response to paragraph 289 of the NDC, the responses
17 in Count 61 are incorporated by reference.

18 290. In response to paragraph 290 of the NDC, Respondent
19 denies said allegations.

20 Count 63

21 291. In response to paragraph 291 of the NDC, Respondent
22 denies said allegations.

23 292. In response to paragraph 292 of the NDC, the responses
24 in Count 61 are incorporated by reference.

25 293. In response to paragraph 293 of the NDC, Respondent
26 denies said allegations.

27 Count 64

28 294. In response to paragraph 294 of the NDC, Respondent
denies said allegations.

1 295. In response to paragraph 295 of the NDC, the responses
2 to Count 61 are incorporated by reference.

3 296. In response to paragraph 296 of the NDC, Respondent
4 denies said allegations.

5 Count 65

6 297. In response to paragraph 297 of the NDC, Respondent
7 denies said allegations.

8 298. In response to paragraph 298 of the NDC, the responses
9 in Count 61 are incorporated by reference.

10 299. In response to paragraph 299 of the NDC, Respondent
11 denies said allegations.

12 Count 66

13 300. In response to paragraph 300 of the NDC, Respondent
14 denies said allegations.

15 301. In response to paragraph 301 of the NDC, the responses
16 in Count 61 are incorporated by reference.

17 302. In response to paragraph 302 of the NDC, Respondent
18 denies said allegations.

19 303. In response to paragraph 303 of the NDC, Respondent
20 denies said allegations.

21 Count 67

22 304. In response to paragraph 304, Respondent denies said
23 allegations.

24 305. In response to paragraph 305 of the NDC, the responses
25 in Count 61 are incorporated by reference.

26 306. In response to paragraph 306 of the NDC, Respondent
27 denies said allegations.

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1 Count 68

2 307. In response to paragraph 307, Respondent denies said
3 allegations.

4 308. In response to paragraph 308 of the NDC, the responses
5 in Count 61 are incorporated by reference.

6 309. In response to paragraph 309 of the NDC, the Agreement
7 speaks for itself.

8 310. In response to paragraph 310 of the NDC, Respondent
9 denies said allegations.

10 Count 69

11 311. In response to paragraph 311 of the NDC, Respondent
12 denies said allegations.

13 312. In response to paragraph 312 of the NDC, the responses
14 in Count 61 are incorporated by reference.

15 313. In response to paragraph 313 of the NDC, Respondent
16 denies said allegations.

17 314. In response to paragraph 314 of the NDC, Respondent
18 denies said allegations.

19 315. In response to paragraph 315 of the NDC, Respondent
20 denies said allegations.

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22 Case Nos. 09-O-13589, 09-O-13845, 09-O-17413, 09-O-18914,
23 09-O-19279, 09-O-19316, 10-O-01289, 10-O-03162, 10-O-03507,
24 10-O-03674, 10-O-03809

25 Count 70

26 316. In response to paragraph 316 of the NDC, Respondent
27 denies said allegations.

28 317. In response to paragraph 317 of the NDC, the responses
in Counts 1 through 69 are incorporated by reference.

1 318. In response to paragraph 318 of the NDC, Respondent
2 denies said allegations.

3 319. In response to paragraph 319 of the NDC, Respondent
4 denies said allegations.

5
6 Dated: *Namun*
 ~~October~~ / , 2010

Respectfully submitted,

9
10 By: *Paul J. Virgo*
11 Paul J. Virgo
12 Attorney for Respondent
13 Zachary I. Gonzalez

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DECLARATION OF SERVICE

I, the undersigned, over the age of eighteen, declare that ☐ I am / ☒ am not a party to the within action, in the City and County of Los Angeles, on November 1, 2010, served the following document(s):

Respondent's Answer to Notice of Disciplinary Charges

☒ by personal delivery:

MELANIE LAWRENCE, Deputy Trial Counsel

☐ other:

I declare under penalty of perjury at Los Angeles, California, on the date shown below, that the foregoing is true and correct.

Dated: 11/1/2010

Paul J. Vingo